

R E M A R K S

Reconsideration of this application is respectfully requested.

THE ALLOWABLE SUBJECT MATTER

The Examiner's allowance of claims 38 and 39 is respectfully acknowledged.

In addition, it is respectfully submitted that, as explained in greater detail below, independent claim 37 also recites allowable subject matter.

THE PRIOR ART REJECTION

Claim 37 was again rejected under 35 USC 102 as being anticipated by USP 6,167,469 ("Safai et al"). This rejection, however, is again respectfully traversed.

In the "Response to Arguments" section on page 2 of the Office Action, the Examiner asserts that Safai et al does disclose "causing the portable communication terminal to display thumbnails corresponding to pre-stored images on the server that were pre-stored by a device other than the portable communication terminal," as recited in independent claim 37.

As support for this assertion, the Examiner admits that according to Safai et al the camera "is responsible for transferring the images to the server." The Examiner notes,

moreover, that according to Safai et al images are stored on the server. Based on these two portions of the disclosure of Safai et al, the Examiner asserts that according to Safai et al the server actually stores the images, while the camera (i.e., the portable communication terminal) merely "transfers" the images.

It is respectfully submitted that this interpretation of Safai et al with respect to claim 37 is not logical and ignores the clear meaning of claim 37. That is, according to claim 37 the portable communication terminal displays thumbnails corresponding to images on the server that were pre-stored by a device other than the portable communication terminal. In other words, according to claim 37 the images that may be related, at the server, to the caller's number of the portable communication terminal have not themselves been stored to the server by the portable communication terminal.

By contrast, according to Safai et al, an account dedicated to the owner of a camera is provided on storage device 614. The camera owner may upload images to the camera owner's own account, and the camera owner can retrieve uploaded images (uploaded using the camera 100) from the camera owner's own account. Indeed, the Examiner acknowledges that according to Safai et al the images stored on the server are uploaded by the camera.

It is respectfully submitted, therefore, that this structure of Safai et al, whereby a camera may be used to upload pictures

to and download the uploaded pictures from a dedicated account on a storage device, clearly does not correspond to the feature of the present invention whereby the images that may be selectively related with the caller's number of the portable communication terminal have not themselves been stored by the portable communication terminal, as recited in independent claim 37.

The Examiner further asserts on page 3 of the Office Action that column 10, lines 33-37 of Safai et al discloses causing a portable communication terminal to display thumbnails corresponding to pre-stored images on the server that were pre-stored by a device other than the portable communication terminal.

It is respectfully pointed out, however, that this portion of Safai et al actually discloses:

The photo select screen 430 comprises a plurality of images 432a-432d, each of which is a small-size representation of a previously taken digital photo that is stored in the digital camera 100.  
(emphasis added)

Thus, Safai et al explicitly discloses that the "small-size" images 432a-432d correspond to images on the camera, not images pre-stored on a server (by a device other than the portable communication device) as recited in independent claim 37.

Still further, the Examiner asserts on page 3 of the Office Action that column 13, lines 10-24 of Safai et al discloses "determining, at the server, whether the portable communication

terminal has issued a registration command to register at least one of the pre-stored images on the server corresponding to at least one of the thumbnails displayed by the portable communication terminal" as recited in claim 37. It is respectfully pointed out, however, that column 13, lines 10-24 of Safai et al actually discloses sending images from the camera 100, and does not even remotely relate to registering images already stored on the server 601 in the manner recited in claim 37. That is, the cited portion of Safai et al clearly relates only to transmission of images from the camera, not to registering of at least one image already on a server.

Yet still further, the Examiner asserts on page 3 of the Office Action that column 13, lines 39-47 and column 14, lines 35-39 of Safai et al discloses "relating, at the server, the at least one selected image with the caller's number of the portable communication terminal and storing the selected image in association with the caller's number of the portable communication terminal when it is determined that the portable communication terminal has issued the registration command." It is respectfully pointed out, however, that column 13, lines 39-47 of Safai et al merely discloses establishing a connection between the camera 100 and the server 601 via a telephone line. This portion of Safai et al contains no mention of relating at least one selected image pre-stored on the server 601 to the caller's

number of the camera. Column 14, lines 35-39, of Safai et al, moreover, relates to printing pictures and sending a header sheet including identification data to a printer. This portion of Safai et al also contains no mention of relating at least one selected image pre-stored on the server 601 to the caller's number of the camera.

In summary, it is respectfully submitted that Safai et al clearly does not disclose, teach or suggest: (i) causing a portable communication terminal to display thumbnails corresponding to pre-stored images on a server (by contrast, column 10, lines 33-37 of Safai et al merely discloses displaying small-size version of images on the camera); (ii) the pre-stored images on the server being pre-stored by a device other than the portable communication terminal (by contrast, column 15 of Safai et al merely discloses a camera that uploads pictures to a storage device and downloads the pictures uploaded by the camera); (iii) determining, at the server, whether the portable communication terminal has issued a registration command to register at least one of the pre-stored images on the server corresponding to at least one of the thumbnails displayed by the portable communication terminal (by contrast, column 13, lines 10-24 of Safai et al merely discloses sending images from the camera 100); and (iv) relating, at the server, the at least one selected image with the caller's number of the portable

communication terminal and storing the selected image in association with the caller's number of the portable communication terminal when it is determined that the portable communication terminal has issued the registration command (by contrast, column 13, lines 39-47 of Safai et al merely discloses establishing a connection between the camera 100 and the server 601 via a telephone line, while column 14, lines 35-39 of Safai et al merely discloses sending a header sheet including identification data to a printer).

Accordingly, it is respectfully submitted that the features of the present invention as recited in independent claim 37 are clearly not disclosed, taught or suggested by Safai et al.

And it is respectfully submitted that the present invention as recited in independent claim 37 clearly patentably distinguishes over Safai et al, under 35 USC 102 as well as under 35 USC 103, along with allowed claims 38 and 39.

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In view of the foregoing, entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned for prompt action.

Respectfully submitted,

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